

Exhibit 2

DON GIBSON, LAUREN CRISS,
JOHN MEINERS, and DANIEL UMPA,
individually and on behalf of all others
similarly situated,

V.

Defendants.

**DECLARATION OF MICHAEL S. KETCHMARK
IN SUPPORT OF CLASS COUNSEL’S MOTION
FOR ATTORNEYS’ FEES, COSTS, EXPENSES AND SERVICE AWARDS**

1. I am a partner at Ketchmark & McCreight, P.C. in Kansas City, Missouri, and counsel for the Plaintiffs and the Class in the *Burnett* action. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards. I make this statement of my own personal knowledge, and if called to testify, would testify competently thereto.

3. In my February 29 declaration, my firm reported \$22,709,710 in lodestar in the *Burnett* action.

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briefing, the approval process, pleadings and discovery, and participated in settlement discussions and mediations with numerous defendants.

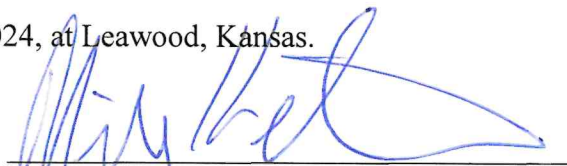
5. The attached Schedule 1 reports the time spent by our firm's personnel in all actions and updated through July 31, 2024. The total for this Schedule is \$25,283,610.

6. In my February 29 declaration, my firm reported \$5,744,767.68 in unreimbursed litigation expenses in the *Burnett* action.

7. The attached Schedule 2 reports our firm's unreimbursed litigation expenses in all actions and updated through July 31, 2024. The total for this Schedule is \$5,839,856.36.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of August, 2024, at Leawood, Kansas.



MICHAEL S. KETCHMARK

SCHEDULE 1

TIMEKEEPER	POSITION	HOURS	RATE	TOTAL
Michael Ketchmark	Partner	6,986.3	\$1,450	\$10,130,135.00
Scott McCreight	Partner	7032.5	\$1,350	\$9,493,875.00
Ben Fadler	Partner	2,328.8	\$1,250	\$2,911,000.00
Steven Ketchmark	Associate	968.0	\$600	\$580,800.00
Dana Hotchkiss	Paralegal	3,808.0	\$300	\$1,142,400.00
Megan Patrick	Paralegal	3,418.0	\$300	\$1,025,400.00
	TOTAL HOURS	24,541.6	TOTAL	\$25,283,610.00

SCHEDULE 2

ACTIVITY	TOTAL COST
Class Certification Notice	\$257,561.62
Copy & Print	\$175,833.59
Court Fees	\$403.00
Document Storage, Production & ESI	\$311,861.13
Depositions	\$384,599.91
Experts & Consultants	\$4,124,047.29
Mediation	\$71,173.81
Miscellaneous	\$766.10
Postage	\$10,624.60
Process Service	\$1,138.14
Records & Transcripts	\$138,485.86
Research	\$20,631.08
Travel & Meals	\$301,855.99
Trial	\$40,874.24
TOTAL	\$5,839,856.36